

James E. Cecchi
Lindsey H. Taylor
CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO
5 Becker Farm Road
Roseland, New Jersey 07068
(973) 994-1700

Mark Lebovitch
Amy Miller
Jeremy Friedman
BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP
1285 Avenue of the Americas
New York, New York 10019
(212) 554-1400

Attorneys for Plaintiffs
MINNEAPOLIS FIREFIGHTERS' RELIEF
ASSOCIATION, NECA-IBEW PENSION
TRUST FUND, and NECA-IBEW WELFARE
TRUST FUND

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MINNEAPOLIS FIREFIGHTERS' RELIEF
ASSOCIATION, NECA-IBEW PENSION
TRUST FUND, and NECA-IBEW WELFARE
TRUST FUND, Derivatively on Behalf of
Nominal Defendant, JOHNSON & JOHNSON,

Plaintiff,

vs.

WILLIAM C. WELDON, *et al.*,

Defendants,

and

JOHNSON & JOHNSON,

Nominal Defendant.

Civil Action No.

NOTICE OF MOTION

ALBERT L. FELDMAN, Derivatively On Behalf of Nominal Defendant JOHNSON & JOHNSON,

Plaintiff,

vs.

MARY SUE COLEMAN, *et al.*,

Defendants

and

JOHNSON & JOHNSON,

Nominal Defendant

Civil Action No. 10-2386 (FLW)

WALTER E. RYAN, JR., derivatively on behalf of JOHNSON & JOHNSON,

Plaintiff,

v.

WILLIAM WELDON, *et al.*

Defendants,

and

JOHNSON & JOHNSON,

Nominal Defendant

Civil Action No. 10-3147(FLW)

JEANNE M. CALAMORE, derivatively on behalf of JOHNSON & JOHNSON,

Plaintiff,

v.

MARY SUE COLEMAN, *et al.*,

Defendants,

and

JOHNSON & JOHNSON,

Civil Action No. 10-2033(FLW)

| | |
|---|-------------------------------|
| Nominal Defendant | |
| <div>CARPENTERS PENSION FUND OF WEST VIRGINIA, Derivatively on Behalf of JOHNSON & JOHNSON,</div> <div>Plaintiff,</div> <div>vs.</div> <div>WILLIAM C. WELDON, <i>et al.</i></div> <div>Defendants,</div> <div>and</div> <div>JOHNSON & JOHNSON,</div> | Civil Action No. 10-2275(FLW) |
| <div>Nominal Defendant</div> <div>HAWAII LABORERS PENSION FUND, Derivatively on Behalf of JOHNSON & JOHNSON,</div> <div>Plaintiff,</div> <div>vs.</div> <div>WILLIAM C. WELDON, <i>et al.</i>,</div> <div>Defendants,</div> <div>and</div> <div>JOHNSON & JOHNSON,</div> <div>Nominal Defendant</div> | Civil Action No. 10-2516(FLW) |

To: All counsel on ECF Distribution Lists

COUNSEL:

PLEASE TAKE NOTICE THAT on Monday, July 19, 2010, at 10 a.m. or as soon thereafter as counsel may be heard, the undersigned counsel for Plaintiffs Minneapolis Firefighters' Relief Association ("MFRA") and NECA-IBEW Pension Trust Fund, and NECA-IBEW Welfare Trust Fund (together "NECA-IBEW") shall move before Hon. Freda L. Wolfson

for an Order: (i) consolidating the above-captioned actions, (ii) appointing Minneapolis as Lead Derivative Plaintiff, and (iii) appointing Bernstein Litowitz Berger & Grossmann LLP and Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. as Co-Lead Derivative Counsel.

The undersigned intends to rely upon the annexed Memorandum of Law in support thereof, and the Declaration of Mark Lebovitch.

The undersigned hereby requests oral argument.

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.
Attorneys for Plaintiffs
MINNEAPOLIS FIREFIGHTERS' RELIEF
ASSOCIATION, NECA-IBEW PENSION TRUST
FUND, and NECA-IBEW WELFARE TRUST
FUND

By: /s/ James E. Cecchi
JAMES E. CECCHI

Dated: June 25, 2010

Of Counsel

Gerald H. Silk
Mark Lebovitch
Amy Miller
Jeremy Friedman
BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP
1285 Avenue of the Americas
New York, New York 10019
(212) 554-1400

Maya Saxena
Joseph E. White III
Christopher S. Jones
Lester R. Hooker
SAXENA WHITE P.A.
2424 North Federal Highway, Suite 257
Boca Raton, Florida 33431
(561) 394-3399

Robert D. Klausner
KLAUSNER & KAUFMANN, P.A.
10059 Northwest 1st Court
Plantation, Florida 33324
(954) 916-1202

Brian Rice
RICE, MICHELS & WALTHER LLP
10 Second Street NE, Suite 206
Minneapolis, Minnesota 55413
(612) 676-2300